

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP 28 2006

U. S. DISTRICT COURT
E. DISTRICT OF MO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT WOOD, III,
a/k/a "Bobby Wood,"

MARK BONDS,
a/k/a "Marco Bonds,"

MARIO LUCAS,
a/k/a "Mooney,"

CHRISTOPHER L. JONES,

BRUCE GALES, and

CHRISTOPHER M. CORNELL,

Defendants.

4:06CR00594JCH
4:06CR00594JCH

INDICTMENT

COUNT ONE: CONSPIRACY TO DISTRIBUTE COCAINE

The Grand Jury charges that:

A. Beginning at a time unknown, but including January, 2005, and continuing thereafter to the present time, with the exact dates unknown to this Grand Jury, in St. Louis County, Missouri, within the Eastern District of Missouri and elsewhere,

**ROBERT WOOD, III - a/k/a "BOBBY WOOD,"
MARK BONDS - a/k/a "MARCO BONDS,"
MARIO LUCAS - a/k/a "MOONEY,"
CHRISTOPHER L. JONES,
BRUCE GALES, and
CHRISTOPHER M. CORNELL,**

the defendants herein, did knowingly and willfully conspire, combine, confederate and agree together with each other, and other persons known and unknown to this Grand Jury, to commit

offense against the United States to wit: to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance drug, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

The quantity of cocaine involved in the offense was in excess of five (5) kilograms, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii).

B. MANNER AND MEANS OF THE CONSPIRACY

The defendants and co-conspirators accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

1. It was part of the drug-trafficking conspiracy that some of the members of the conspiracy would transport, or cause to be transported, cocaine from outside the Eastern District of Missouri to the St. Louis metropolitan area.
2. It was further part of the drug-trafficking conspiracy that safe houses and other locations were maintained and utilized by some members of the conspiracy for the purpose of storing and distributing cocaine, U.S. currency representing drug sale proceeds and vehicles used to transport the cocaine.
3. It was further part of the drug-trafficking conspiracy that some members of the conspiracy would utilize numerous cellular telephones, some of which were obtained in the names of third parties, to maintain communication and facilitate their drug trafficking activity.
4. It was further part of the drug-trafficking conspiracy that defendant **ROBERT WOOD, III a/k/a "BOBBY WOOD"** was the leader of the organization, receiving cocaine from outside the Eastern District of Missouri and supplying other members of the organization in the Eastern District of Missouri for distribution in the Eastern District of Missouri.

5. It was further part of the drug-trafficking conspiracy that between approximately January 2005, and the date of this indictment, Wood arranged for approximately 8 to 10 multi-kilogram cocaine shipments to St. Louis totaling approximately 120 kilograms.

6. It was further part of the drug-trafficking conspiracy that each cocaine shipment was delivered via an automobile. Some transport vehicles were equipped with hidden compartments to conceal the cocaine during transport. Upon receipt of the cocaine, **ROBERT WOOD, III a/k/a "BOBBY WOOD"** divided the kilograms among **CHRISTOPHER L. JONES, MARIO LUCAS a/k/a "MOONEY"** and **MARK BONDS a/k/a MARIO BONDS** for distribution.

7. It was further part of the drug-trafficking conspiracy that defendants **CHRISTOPHER L. JONES** and **MARIO LUCAS a/k/a "MOONEY"** were managers and primary distributors of cocaine supplied by defendant **ROBERT WOOD, III a/k/a "BOBBY WOOD"** for the conspiracy.

8. It was further part of the drug-trafficking conspiracy that defendant **MARK BONDS a/k/a "MARCO BONDS"** was a distributor of cocaine provided by defendant **ROBERT WOOD, III a/k/a "BOBBY WOOD."**

9. It was further part of the drug-trafficking conspiracy that defendant **CHRISTOPHER M. CORNELL**, while employed as a police sergeant with the Hillsdale Police Department and under the direction of **ROBERT WOOD A/K/A "BOBBY WOOD"**, assisted the conspiracy by conducting traffic stops and arresting the occupants of vehicles delivering cocaine to **ROBERT WOOD, III a/k/a "BOBBY WOOD."**

10. It was further part of the drug-trafficking conspiracy that defendant **BRUCE GALES**, while employed as the owner of Galez Towing and Recovery and under the direction of

ROBERT WOOD A/K/A "BOBBY WOOD", assisted the conspiracy by stealing and/or breaking into vehicles used to transport cocaine after the vehicle was stopped and the driver taken to the Hillsdale Police Department by **CHRISTOPHER M. CORNELL**.

11. It was further part of the drug-trafficking conspiracy that throughout the course of the conspiracy, the defendants purchased several vehicles using the proceeds of narcotic sales.

OVERT ACTS OF THE COCAINE CONSPIRACY

1. On July 14, 2005, FBI surveillance observed and videotaped a meeting between **ROBERT WOOD, III a/k/a "BOBBY WOOD"** and **MARK BONDS a/k/a MARIO BONDS** at Bond's residence located at 5156 Delcastle in St. Louis County. At the meeting **ROBERT WOOD, III a/k/a "BOBBY WOOD"** transferred approximately one kilogram of cocaine that was partially recovered by the FBI.

2. On July 18, 2005, FBI surveillance observed and recorded the purchase of 306 grams of cocaine from **MARIO LUCAS a/k/a "MOONEY"**.

3. On August 18, 2005, **ROBERT WOOD, III a/k/a "BOBBY WOOD"**, **BRUCE GALES** and Hillsdale Police Sergeant **CHRISTOPHER M. CORNELL** orchestrated a traffic stop of a vehicle that contained approximately 15 kilograms of cocaine. The driver of the vehicle was arrested and taken to the Hillsdale Police Department while Wood and Gales stole the vehicle from the roadside using a tow truck owned by **BRUCE GALES**. Wood and Gales later removed the cocaine from the vehicle. Following his release from Hillsdale, Wood advised the driver of the vehicle that the vehicle had been stolen.

7. Shortly after the events of August 18, 2005, **ROBERT WOOD, III a/k/a "BOBBY WOOD"** paid **CHRISTOPHER M. CORNELL** approximately \$200.00 for his assistance in making the traffic stop and arrest. Wood also paid **BRUCE GALES** \$30,000.00 for his

assistance in towing the transport vehicle from the scene of the traffic stop and assisting in the removal of the cocaine.

8. On October 13, 2005, a federal search warrant was executed at 8845 Jennings Station Road after FBI intercepted conversations pursuant to the wiretap orders that led law enforcement to believe **MARK BONDS a/k/a MARIO LUCAS** and others were preparing to burglarize the residence and possibly harm its occupants in order to steal U.S. currency that represented proceeds of narcotics sales. The search warrant resulted in the seizure of \$99,810.00 from the residence.

9. On August 22, 2006, FBI observed and videotaped a meeting between **ROBERT WOOD, III a/k/a "BOBBY WOOD"** and **CHRISTOPHER M. CORNELL** wherein Wood arranged for another traffic stop and arrest of a drug transport vehicle. During the meeting Wood paid Cornell \$1,000.00 for his assistance in the traffic stop and arrest.

~~10. On August 28, 2006, the FBI observed and video taped the pre-arranged traffic stop of~~
a vehicle occupied by an FBI cooperator posing as a drug trafficker. The traffic stop was conducted by Sgt. **CHRISTOPHER M. CORNELL** and the driver was taken to the Hillsdale Police Station. Shortly after the driver was removed from the scene FBI Observed and videotaped the arrival of **ROBERT WOOD, III a/k/a "BOBBY WOOD"** and **BRUCE GALES** who entered the vehicle and removed a duffle bag from the rear seat that purportedly contained cocaine.

11. On August 31, 2006, the FBI observed and audio taped a meeting between **ROBERT WOOD, III a/k/a "BOBBY WOOD"** and **BRUCE GALES** wherein Wood paid Gales \$5,000.00 for his assistance in the August 28, 2005, traffic stop.

**COUNT II: ATTEMPT TO POSSESS WITH THE INTENT
TO DISTRIBUTE COCAINE**

The Grand Jury further charges that:

On or about August 28, 2006, in St. Louis County, in the Eastern District of Missouri,

BRUCE GALES
and
CHRISTOPHER M. CORNELL

the defendants herein, with ROBERT WOOD a/k/a "BOBBY WOOD," did knowingly and intentionally attempted to possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance and committed a substantial step in furtherance thereof, in violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2; and

The quantity of the mixture or substance containing a detectable amount of cocaine involved in the offense was in excess of five (5) kilograms, punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii).

COUNT III: USE OF A COMMUNICATION DEVICE TO FACILITATE A FELONY

The Grand Jury further charges that:

On or about between August 27, 2006 and August 31, 2006, in St. Louis County, in the Eastern District of Missouri and elsewhere, the defendants,

BRUCE GALES
and
CHRISTOPHER M. CORNELL

the defendants herein, with ROBERT WOOD, III - a/k/a "BOBBY WOOD," did knowingly and intentionally use a communication facility; that being a telephone, in causing or facilitating the commission of acts constituting a felony under the Controlled Substance Act, to wit; attempt to

possess with the intent to distribute cocaine, a Schedule II Narcotic Controlled Substance Drug.

All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT IV : CONSPIRACY TO COMMIT MONEY LAUNDERING

The Grand Jury further charges that:

A. Beginning at a time unknown, but including January 2005, and continuing thereafter to the present time, with the exact dates unknown to this Grand Jury, in St. Louis County, Missouri, within the Eastern District of Missouri and elsewhere, the defendants,

ROBERT WOOD, III - a/k/a "BOBBY WOOD"
and
BRUCE GALES

did knowingly and willfully conspire, combine, confederate, and agree with each other and other persons known and unknown to this Grand Jury, to commit certain offenses under Title 18, United States Code, Section 1956 as follows: to knowingly and willfully conduct and attempt to conduct financial transactions involving the use of financial institutions, which in some way or degree affected interstate commerce and which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute cocaine and attempt to possess with the intent to distribute cocaine as charged in Counts I and II, knowing that the property involved in said transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, and control of the proceeds of the aforesaid specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

B. MANNER AND MEANS OF THE CONSPIRACY

The defendants and co-conspirators accomplished and attempted to accomplish the objects of the money laundering conspiracy in the following manner and through the following means:

1. The allegations of Counts I through II of this Indictment are re-alleged and by this reference fully incorporated herein.
2. It was part of said conspiracy that defendants and others arranged for and directed large amounts of cocaine to be transported from outside the Eastern District of Missouri to the St. Louis metropolitan area and elsewhere for the purpose of further distribution.
3. It was further part of said conspiracy that the sale of large quantities of cocaine generated large amounts of drug proceeds.
4. It was further part of said conspiracy that defendants and others used U.S. currency generated from the sales of cocaine to purchase vehicles and motorcycles for the purpose of concealing or disguising the nature, location, source, and control of the proceeds of the cocaine sales.

C. OVERT ACTS

In furtherance of said conspiracy and to affect the objects thereof, overt acts were committed in the Eastern District of Missouri and elsewhere, including but not limited to the following:

1. On March 10, 2005, **ROBERT WOOD - a/k/a "BOBBY WOOD"** and **BRUCE GALES** negotiated the sale of a 2005 Big Dog Ridgeback motorcycle for \$26,350.00 and a Big Dog Mastiff motorcycle for \$29,400.00 at Gateway Big Dog Motorcycles. The total purchase price was paid in cash by **BRUCE GALES** and totaled \$55,750.00. **BRUCE GALES** caused the Ridgeback motorcycle to be titled in the name of "Galez Towing and Recovery" and later

transferred the title to Ylva Wood stating in an affidavit filed for transfer of title that **BRUCE GALES** gifted the motorcycle to Ylva Wood. Ylva Wood is the sister of **ROBERT WOOD a/k/a "BOBBY WOOD."** **BRUCE GALES** later returned the Mastiff motorcycle for a refund.

2. Sometime between April 5, 2005 and June 14, 2005, **ROBERT WOOD a/k/a "BOBBY WOOD"** purchased of 1969 Chevrolet Camaro VIN 123379N565057 from Kevin Nowak for the price of between \$52,000.00 and \$54,000.00 in U.S. currency. **ROBERT WOOD a/k/a "BOBBY WOOD"** completed the title to the Camaro to reflect the purchase was made by Sonja Oliver and the purchase price was \$100.00. Sonja Oliver is the mother of **ROBERT WOOD a/k/a "BOBBY WOOD."**

3. On October 4, 2005, **ROBERT WOOD a/k/a "BOBBY WOOD,"** accompanied by his girlfriend Leah Easley, purchased a 2003 Mercedes-Benz SL-500 VIN WDBSK75F059400 from Tri-Star Imports for \$75,187.50. Wood traded in a 2003 Range Rover titled to Th-Ron's Motors and signed by Aaron Evans who is the owner/operator of Th-Ron Motors. The Range Rover trade-in was valued at \$40,500.00 leaving a balance of \$34,687.50. The Mercedes Benz was purchased in the name of Leah Easley who obtained financing from U.S. Bank for the outstanding balance of the vehicle.

All of which were for the purpose to conceal or disguise the nature, location, source, and control of the proceeds of the conspiracy to distribute cocaine.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h).

COUNT V: FORFEITURE COUNT

1. The allegations of Counts I through Count IV in this Indictment are hereby repeated and re-alleged as if fully set forth herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 21, United States Code, Section 853.

2. The property, real and personal, of defendants **ROBERT WOOD a/k/a "BOBBY WOOD," MARK BONDS a/k/a "MARCO BONDS,"** and **BRUCE GALES** which constitutes or is derived from any proceeds defendants **ROBERT WOOD a/k/a "BOBBY WOOD," MARK BONDS a/k/a "MARCO BONDS,"** and **BRUCE GALES** obtained, directly or indirectly, as a result of the violation of law set out in Counts I - III of this Indictment and which was used or intended to be used in any manner or part to commit or facilitate the commission of such violations while defendant **ROBERT WOOD a/k/a BOBBY WOOD** engaged in the criminal conduct alleged in Counts I - III of this Indictment, is property subject to forfeiture under the provisions of Title 21, United States Code, Section 853(a).

3. Specifically subject to forfeiture is approximately two million, two hundred eighty thousand dollars (\$2,280,000.00) in United States Currency in that such sum in the aggregate is property constituting, or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses alleged in Counts I - III.

4. Properties specifically subject to forfeiture as set out in paragraphs 2 and 3 above, include, but are not limited to:

- a. 2005 Big Dog Ridgeback Motorcycle, VIN 5J11RBJ195W000452;
- b. 2005 Big Dog Pitbull Motorcycle, VIN 5J11HBJ195W000082;
- c. 1969 Chevrolet Camaro, VIN 123379N565057;
- d. 2003 Mercedes-Benz SL500, VIN WDBSK75F03F059400;
- e. 1999 Pontiac Grand-Prix, VIN 1G2WP52K0XF233941;
- f. 2005 Pontiac GTO, VIN 6G2VX12U95L426774;
- g. Ninety-Nine Thousand, Eight Hundred Ten Dollars (\$99,810.00) U.S. Currency;
- h. 1971 Chevrolet Monte Carlo, VIN 138571K156995;
- i. 1973 Chevrolet Nova, VIN 1Y27H3L222307;
- j. 2003 Land Rover, VIN SALME11453A131054;

k. Forty-One Thousand, Eight Hundred Thirty Dollars (\$41,830.00) U.S. Currency.

5. If any of the property described in paragraphs 2 and 3 above, as being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a), as a result of any act or omission of the defendant,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; and/or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A) and Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the property described in paragraphs 2 and 3 above, or elsewhere, as being subject to forfeiture.

A TRUE BILL.

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

JOHN T DAVIS, #74771
Assistant United States Attorney